

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
COLUMBIA DIVISION

JEFFERY LOWE,

Plaintiff,

Case No. 1:18-cv-0027

v.

Judge Campbell
Magistrate Judge Frensley
JURY DEMAND

CALSONIC KANSEI NORTH
AMERICA, INC.

Defendant.

_____ /

PLAINTIFF'S [PROPOSED] VERDICT FORM

1. Do you find by a preponderance of the evidence that Defendant Calsonic discharged Mr. Lowe because of his disability?
_____ YES _____ NO
2. Do you find by a preponderance of the evidence that Defendant Calsonic failed to reasonably accommodate Mr. Lowe's disability?
_____ YES _____ NO
3. Do you find by a preponderance of the evidence that Defendant Calsonic discharged Mr. Lowe in retaliation for requesting an accommodation under the ADA?
_____ YES _____ NO
4. Do you find by a preponderance of the evidence that Defendant Calsonic discharged Mr. Lowe in retaliation for exercising his rights under the FMLA?
_____ YES _____ NO
5. If you answered "YES" to Question 1, 2, 3 or 4 state what back pay damages Plaintiff should be awarded against Defendant.

\$ _____
(Amount of Damages)

6. If you answered “YES” to Question 1, 2, or 3 state what front pay damages Plaintiff should be awarded against Defendant.

\$ _____
(Amount of Damages)

7. If you answered “YES” to Question 2, do you find by a preponderance of the evidence that Defendant engaged in a good faith interactive process with Plaintiff?

_____ YES _____ NO

8. If you answered “YES” to Question 1, 2 or 3 state what compensatory damages (emotional distress, inconvenience, embarrassment, humiliation, and loss of enjoyment of life) Plaintiff should be awarded against Defendant.

\$ _____
(Amount of Damages)

9. If you answered “YES” to Question 4 mark “Yes” or “No” whether Defendant Calsonic had a good faith belief its actions reasonably complied with the FMLA.

_____ (YES) _____ (NO)

10. If you answered “YES” to Question 1, 2, or 3 mark “Yes” or “No” whether Plaintiff should be awarded punitive damages against Defendant.

_____ (YES) _____ (NO)

11. If you answered “YES” to Question 9 state what amount Plaintiff should be awarded as punitive damages against Defendant.

\$ _____
(Amount of Damages)

Please sign and date this form and return it to the Court.

Presiding Juror

Date

Respectfully submitted,

/s/ Heather Moore Collins

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CERTIFICATE OF SERVICE

I hereby certify that on August 5, 2021, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt: Matthew C. Lonergan, John P. Rodgers, Bradley Arant Boult Cummings, 1600 Division Street, Suite 700, Nashville, TN 37203, jroddgers@bradley.com, mlonergran@bradley.com

/s/ Heather Moore Collins

Heather Moore Collins